

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE:

OPENAI, INC.,

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This Document Relates To:

All Cases

25-md-3143 (SHS) (OTW)

PLAINTIFFS' MOTION TO SEAL

Under paragraph 34 of the Stipulated Protective Order in this case (MDL Dkt. 367), Class and News Plaintiffs (collectively, “Plaintiffs”) respectfully seek to provisionally file under seal Exhibit 1 to their Request for Permission to File the Over-Length Letter Regarding OpenAI’s Declarations (Dkts. 461 and 482). Exhibit 1 includes a letter to the Court regarding OpenAI’s Declarations describing its custodial interview, collection, and review processes for text and social media messages (Dkts. 461 and 482). Plaintiffs seek to provisionally file Exhibit 1 under seal because it discusses documents and information that OpenAI has designated as Protected Discovery Material under the Protective Order. Dkt. 367 ¶ 34. Plaintiffs do not affirmatively seek to seal any material. Under the Protective Order, OpenAI has five business days to file a statement of reasons for why the material should be sealed. *Id.* Plaintiffs will review OpenAI’s filings, and if necessary, confer about any disagreement.

Dated: September 3, 2025

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